

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

**AGREED MOTION FOR ENLARGEMENT OF TIME  
AND LEAVE TO EXCEED PAGE LIMIT**

Plaintiffs by their undersigned attorneys of record, pursuant to Federal Rule of Civil Procedure 6(b)(1)(A) and Local Rule 7-4.01(D) and for good cause shown, move this Court for (a) a one-day extension of its time to file their Omnibus Response to Objections that was due seven days prior to the May 19, 2016 Fairness Hearing in this matter (Dkt.164) and (b) leave to exceed page limitations for Plaintiffs' Omnibus Response to Objections, Plaintiffs' Memorandum in Support of Motion for Final Approval of Class Settlement (Dkt. 198), and Memorandum in Support of Plaintiffs' Application for Attorneys Fees and Expenses (Dkt. 201). In support of this motion, Plaintiffs state as follows:

1. This motion is being made with the consent of Defendant Blue Buffalo Company, Ltd. (“Blue Buffalo”).
2. On December 18, 2015, this Court set a schedule for the briefing of the matters to be considered at the final Fairness Hearing and set seven days prior to said hearing as the deadline for the Parties’ Joint Proposed Order for Final Approval, all supporting briefing for approval and fees, and any further response to any objections that may have been received.

3. All briefing in support of Final Approval of the Settlement and a proposed order for Final Approval as well as all briefing in support of an award of attorneys' fees and expenses and a proposed order for payment of fees and expense has been filed.
4. Filed contemporaneously with this Motion is Plaintiffs' Omnibus Response to Objections. Good cause exists for this extension of time because (i) Plaintiffs deposed several objectors and received certain deposition transcripts later than anticipated. These transcripts were relied upon by Plaintiffs in their briefing; and (ii) An Objector informed Plaintiffs on Tuesday evening that his objection would be withdrawn, and Plaintiffs had hoped to have this withdrawal formalized prior to submitting the Omnibus Response.
5. Additionally, good cause exists for leave to exceed page limitations for Plaintiffs' Omnibus Response to Objections, Plaintiffs' Memorandum in Support of Motion for Final Approval of Class Settlement, and Memorandum in Support of Plaintiffs' Application for Attorneys Fees and Expenses. In regard to these documents, Plaintiffs were required to address several objections from multiple objectors, in addition to having to make their general arguments in support for of their Motions. Thus, due to the varied nature and scope of the topics addressed, as well as the importance of these matters to not only themselves but the putative class, Plaintiffs require additional pages in order to adequately address these topics.
6. No prejudice will accrue to any party or objector since the schedule did not permit reply; Blue Buffalo has consented; all other papers related to the Final Approval of the Settlement, including all supporting declarations have been filed, and no less than 6 days remain for any interested person to review this last filing before the final Fairness Hearing.

7. A proposed order is submitted herewith to the Court.

WHEREFORE, for the foregoing reasons, Plaintiffs respectfully move this Court for an Order (a) extending the time for which Plaintiffs may file their Omnibus Response to Objectors by one day, until May 13, 2016 and (b) granting leave to exceed page limitations.

Dated: May 13, 2016

Respectfully Submitted,

/s/ Scott A. Kamber  
Scott A. Kamber (SK-5794,SDNY)  
KamberLaw LLC  
100 Wall Street 23rd floor  
New York, NY 10005  
P. (212) 920-3072  
F. (212) 202-6364  
skamber@kamberlaw.com

Deborah Kravitz, #275661CA  
KamberLaw LLP  
401 Center St., Suite 111  
Healdsburg, CA  
P. (707) 820-4247  
F. (212) 202-6364  
dkravitz@kamberlaw.com

*Class Counsel, Settlement and Chair of the  
Plaintiffs' Executive Committee*

/s/ John G. Simon  
The Simon Law Firm, P.C.  
John G. Simon, #35231MO  
800 Market Street, 17th FL  
St. Louis, Missouri 63101  
P. (314) 241-2929  
F. (314) 241-2029  
jsimon@simonlawpc.com

*Liaison Counsel and Member Plaintiffs' Executive  
Committee*

Gray, Ritter & Graham, P.C.  
Don M. Downing #30405MO  
701 Market Street, Suite 800  
St. Louis, MO 63101-1826  
P. (314) 241-5620, ext. 2006

F. (314) 241-4140  
ddowning@grgpc.com

Bursor & Fisher, P.A.  
Joseph I. Marchese  
Frederick J. Klorczyk, III  
888 Seventh Ave.  
New York, NY 10019  
P. 646-837-7410  
F. 212-989-9163  
jmarchese@bursor.com  
fklorczyk@bursor.com

Steelman, Gaunt & Horsefield  
David Steelman, #27334MO  
901 N Pine St  
Rolla, MO 6540  
P. (573) 341-8336  
F. (573) 341.8548  
dsteelman@steelmanandgaunt.com

*Members of Plaintiffs' Executive Committee*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of the foregoing was served electronically upon all counsel of record via the CM/ECF system on this 13th day of May, 2016.

/s/ John G. Simon